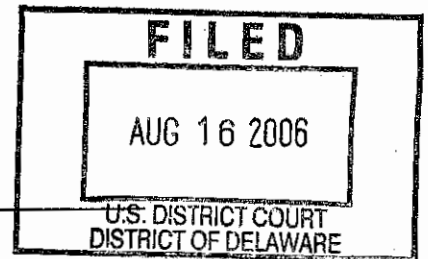


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Marvin D. Spady Plaintiff/s
V.
Hudson et al Defendant/s

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Civil Action No.: D6-427-SLR



MOTION FOR Appointment of Counsel

COMES NOW, the Plaintiff, Marvin D. Spady

pursuant to 28 U.S.C. § 1915 (e)(1), moves this

Honorable Court to grant this motion. In support, the following facts are asserted;

1. Plaintiff is unable to afford Counsel, his request to proceed in forma pauperis is granted.
2. Plaintiff's imprisonment will greatly limit his ability to litigate. The issues involved in this case are complex, and require significant research and investigation. Plaintiff has limited access to the law library and limited knowledge of the law.
3. A trial in this case will likely involve conflicting testimony, and counsel would better enable plaintiff to present evidence and cross examine witness.
4. Plaintiff has made repeated efforts to obtain a lawyer. Attached to this motion are letters from lawyers. Wherefore, plaintiff request that the court appoint him counsel

DATED, Aug 14, 2006

Marvin D. Spady Bldg. PT HU 304
SBI 224202
SCI P.O. Box 500
Georgetown, De 19947
Marvin D. Spady

CERTIFICATE OF SERVICE

I, Marvin D. Spady, hereby certify that I have served a true and correct copy of the attached motion upon the following party, on the 14 day of Aug 2006, A.D.

**** Circle the Department of Justice you are serving ****

Deputy Attorney General
Department of Justice
820 North French Street
Wilmington, DE 19801

Deputy Attorney General
Department of Justice
102 West Water Street
Dover, DE 19904

Deputy Attorney General
Department of Justice
114 East Market Street
Georgetown, DE 19947

8-14-06
Date Signed

Marvin D. Spady
Signature of Movant (Notarization not required)

LAW OFFICES OF
BARROS, McNAMARA, MALKIEWICZ & TAYLOR, P.A.
2 WEST LOOCKERMAN STREET
P.O. BOX 1298
DOVER, DELAWARE 19903
Telephone: 302-734-8400
Fax: 302-734-8969

A. RICHARD BARROS
EDWARD R. McNAMARA
MICHAEL J. MALKIEWICZ
ROBERT J. TAYLOR
J. JAY LAZZERI
BRADLEY S. EABY

Branch Offices
34382 Carpenter's Way, Suite D
Lewes, DE 19958
Telephone: 800-734-LAWS (5297)

306 E. Stein Highway
Seaford, DE 19973
Telephone: 800-734-LAWS (5297)

Please respond/fax to our Dover office only

February 23, 2006

Mr. Marvin D. Spady
I/M: 224202
Bldg: P/T H.U. 114
Sussex Correctional Institution
P.O. Box 500
Georgetown, DE 19947

Mr. Spady:

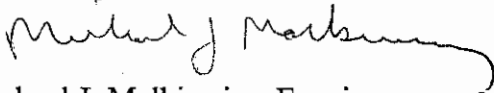
Neither I nor anyone in my law firm handles the type of law suit that you are suggesting be brought against the State of Delaware for violating your civil rights.

I really do not know of any attorney who has brought this type of case against the State of Delaware.

You may want to file a letter and a Motion with your sentencing judge. The letter and Motion would tell the sentencing judge the problem that you have encountered, and ask the judge to issue a corrective order instructing the State of Delaware to remove your identification from the Internet, etc.

Sincerely,

BARROS, McNAMARA, MALKIEWICZ
& TAYLOR, P.A.



Michael J. Malkiewicz, Esquire

MJM/sep

MASTEN AND RAY
Counsellors at Law

P.O. BOX 406
PENNSVILLE, NEW JERSEY 08070-0406
(856) 678-4777

DONALD L. MASTEN
WALTER J. RAY

254 S. BROADWAY

FAX: (856) 678-6805

April 21, 2006

Mr. Marvin D. Spady, 224202
Building PT HU 114
Sussex Correctional Institution
P. O. Box 500
Georgetown, DE 19947

Dear Mr. Spady:

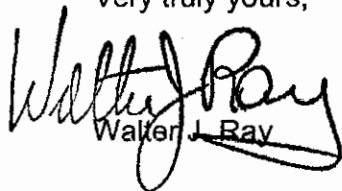
Thank you for your letter in the above-referenced matter dated April 14, 2006.

Based on the content of your letter, I believe you will require the services of a Delaware attorney. Unfortunately, I am only licensed to practice in the State of New Jersey; therefore, I cannot be of any assistance to you with regard to your claims against those whom you believe have caused you injury.

I respectfully suggest that you seek the services of a Delaware attorney to assist you in the above-referenced matter.

Please note that I am returning your correspondence.

Very truly yours,


Walter J. Ray

WJR/ibs
Enclosure

MARGOLIS EDELSTEIN

ATTORNEYS AT LAW
www.margolisedelstein.com

DELAWARE OFFICE:
1509 GILPIN AVENUE
WILMINGTON, DE 19806
302-777-4680
FAX 302-777-4682

JEFFREY K. MARTIN, ESQUIRE
jmartin@margolisedelstein.com

June 9, 2006

PHILADELPHIA OFFICE:*
THE CURTIS CENTER, 4TH FLOOR
601 WALNUT STREET
INDEPENDENCE SQUARE WEST
PHILADELPHIA, PA 19106-3304
215-922-1100
FAX 215-922-1772

Marvin D. Spady
SBI# 00224202
Sussex Correctional Institution
P.O. Box 500
Georgetown, DE 19947

HARRISBURG OFFICE:*
3510 TRINDLE ROAD
CAMP HILL, PA 17011
717-975-8114
FAX 717-975-8124

RE: Correspondence to Jeffrey K. Martin for representation

PITTSBURGH OFFICE:
310 GRANT STREET
THE GRANT BUILDING, SUITE 1500
PITTSBURGH, PA 15219
412-281-4256
FAX 412-642-2380

Dear Marvin:

Thank you for your correspondence received June 8, 2006. After review and consideration, we are writing to advise that we will be unable to represent you in this matter at this time due to case overload.

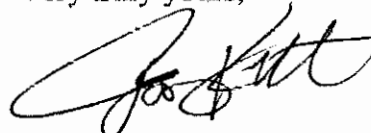
However, please send us any records you have regarding your status in the grievance process. We will keep your letter and name on file should we be able to help you in the future.

Best of luck in your future endeavors.

SCRANTON OFFICE:
THE OPPENHEIM BUILDING
409 LACKAWANNA AVENUE
SUITE 3C
SCRANTON, PA 18503
570-342-4231
FAX 570-342-4841

SOUTH NEW JERSEY OFFICE:*
SENTRY OFFICE PLAZA
216 HADDON AVENUE, 2ND FLOOR
P.O. Box 92222
WESTMONT, NJ 08108
856-858-7200
FAX 856-858-1017

Very truly yours,



JEFFREY K. MARTIN

NORTH NEW JERSEY OFFICE:
CONNELL CORPORATE CENTER
THREE CONNELL DRIVE
SUITE 6200
BERKELEY HEIGHTS, NJ 07922
908-790-1401
FAX 908-790-1486

JKM:smn

GRADY & HAMPTON, LLC
6 NORTH BRADFORD STREET
DOVER, DELAWARE 19904

JOHN S. GRADY
STEPHEN A. HAMPTON
LAURA F. BROWNING

DOVER (302) 678-1265
SUSSEX (302) 855-1313
FAX (302) 678-3544

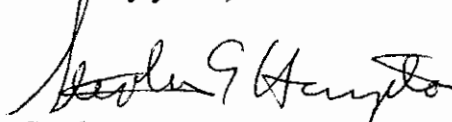
March 15, 2006

Marvin Spady
SBI 224202
Sussex Correctional Institution
P. O. Box 500
Georgetown, DE 19947

Dear Mr. Spady:

I am sorry, but I do not do criminal defense cases and I am not familiar with the sex offender posting regulations. Therefore, I cannot help you with your case.

Sincerely yours,



Stephen A. Hampton

SAH:slh

MARGOLIS EDELSTEIN

ATTORNEYS AT LAW
www.margolisedelstein.com

DELAWARE OFFICE:
1509 GILPIN AVENUE
WILMINGTON, DE 19806
302-777-4680
FAX 302-777-4682

JEFFREY K. MARTIN, ESQUIRE
jmartin@margolisedelstein.com

June 2, 2006

PHILADELPHIA OFFICE:*
THE CURTIS CENTER, 4TH FLOOR
601 WALNUT STREET
INDEPENDENCE SQUARE WEST
PHILADELPHIA, PA 19106-3304
215-922-1100
FAX 215-922-1772

Marvin D. Spady – 224202
Sussex Correctional Institute
P.O. Box 500
Georgetown, DE 19947

HARRISBURG OFFICE:*
3510 TRINDLE ROAD
CAMP HILL, PA 17011
717-975-8114
FAX 717-975-8124

RE: Correspondence to Jeffrey K. Martin for representation

PITTSBURGH OFFICE:
310 GRANT STREET
THE GRANT BUILDING, SUITE 1500
PITTSBURGH, PA 15219
412-281-4256
FAX 412-642-2380

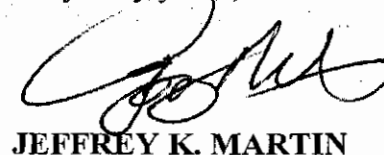
Dear Marvin:

Thank you for your correspondence received March 11, 2006. After review and consideration, we are writing to advise that we will be unable to represent you in this matter at this time due to case overload.

However, please send us any records you have regarding your status in the grievance process. We will keep your letter and name on file should we be able to help you in the future.

Best of luck in your future endeavors.

Very truly yours,



JEFFREY K. MARTIN

JKM:smn

SOUTH NEW JERSEY OFFICE:*
SENTRY OFFICE PLAZA
216 HADDON AVENUE, 2ND FLOOR
P.O. Box 92222
WESTMONT, NJ 08108
856-858-7200
FAX 856-858-1017

NORTH NEW JERSEY OFFICE:
CONNELL CORPORATE CENTER
THREE CONNELL DRIVE
SUITE 6200
BERKELEY HEIGHTS, NJ 07922
908-790-1401
FAX 908-790-1486

Law Office of Edward C. Gill, P.A.

16 N. BEDFORD STREET
P.O. BOX 824
GEORGETOWN, DELAWARE 19947-0824

EDWARD C. GILL
THERESA McQUAID HAYES (DE, VA)
MICHAEL R. ABRAM

PHONE: 302-854-5400
FAX: 302-854-5409

February 13, 2006

Marvin D. Spady
c/o SCI
Building PT HU
SBI 224202
P.O. Box 500
Georgetown, Delaware 19947

Dear Mr. Spady:

Thank you for your letter. However, I am not handling cases such as yours at the present time.

If you should have any further questions please do not hesitate to contact me.

Sincerely,



Edward C. Gill

ECG/jm

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Marvin D. Spady,

V.

Hudson et al

No. 06-427-SLR

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NOTICE OF MOTION

TO: Dept. of Justice
Deputy Attorney General
820 North French St.
Wilmington, DE 19801



BO scanned

PLEASE TAKE NOTICE that the attached Motion for Appointment
of Counsel will be presented at the convenience
of the Honorable Court.

Marvin D. Spady Bldg PT HU 304
S.B.I. 224202
S.C.I. P.O. Box 500
Georgetown, De 19947
Marvin D. Spady

DATED: Aug 14, 2006

224702
I/M: Marvin Q Spady BLDG: DT HM 304
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500
GEORGETOWN, DELAWARE 19947

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Office of the Clerk

United States District Court

844 N. King Street, Lockbox 18

Wilmington De

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A-RAY